# Appendix E

Avila Overnight Accommodations Existing Conditions

## DRAFT MEMORANDUM

To: Kimmie Nguyen, County of San Luis Obispo

From: Benjamin C. Sigman, Ashley Boots, and Taylor Henry

Subject: Avila Overnight Accommodations Existing Conditions

Date: March 19, 2021

The County of San Luis Obispo (County) engaged Economic & Planning Systems, Inc. (EPS) to evaluate market conditions for overnight accommodations within Avila, with a focus on assessing availability and pricing of "Lower-Cost Overnight Accommodations" (LCOA). Many coastal communities in California face high demand for overnight visits, but have a limited supply of LCOA. Hotel, motel, and short-term rental room rates have increased significantly over the years, making overnight stays prohibitively expensive for many Californians and visitors to the State.

The California Coastal Commission (CCC) has expressed a growing concern that the lack of LCOA in the Coastal Zone statewide is limiting access to the coast. The California Coastal Act (CCA) addresses this concern, stating "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred" (see Section 30213). This LCOA research effort seeks to characterize accommodation supply, location, and average daily rates (ADR) for overnight accommodations in within Avila.

For this effort, EPS developed an inventory of accommodations, including various types of existing visitor-serving overnight accommodations in the community's Coastal Zone and inland areas. EPS accounted for hotels and motels, as well as short-term rentals, campgrounds, and other accommodations that accommodate visitors to Avila. EPS collected and synthesized accommodations data to help the County understand the key characteristics of accommodations in Avila. The reporting categories provided here are consistent with CCC guidance for LCOA assessment.

The Economics of Land Use



Economic & Planning Systems, Inc. 1330 Broadway Suite 450 Oakland, CA 94612 510 841 9190 tel

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# Methodology

#### **Defining Low Cost Lodging**

The California Coastal Commission generally divides overnight accommodations into three cost categories— "lower," "moderate," and "higher" cost. In a report produced for one of its public workshops on the topic of LCOA, the Commission provided guidance on the cost categories generally associated with different types of accommodations. According to the CCC:

- "Campgrounds, cabins and hostels are typically lower cost by their nature." Previous CCC workshop reports reconfirm that these types of accommodations are generally defined as lower cost accommodations.
- Short term vacation rentals can provide a lower cost option, especially for larger groups or families, but because it is difficult to find data on short term vacation rentals, it is not clear how large a role they play in providing lower cost accommodations." While the Commission expresses general support for the provision of short-term vacation rentals (STVRs) in the Coastal Zone, it does not provide further guidance on how to define the cost category of these accommodations.
- "Hotels are by their nature more expensive than hostels, campgrounds and most cabins.
  Thus, the Commission's determination of the rate of a lower cost hotel cannot be used to
  represent the definition of all lower cost overnight accommodations." This statement clarifies
  that the calculation of a lower-cost threshold, as defined below, is only directly applicable to
  the analysis of the ADRs of hotel and motel rooms.

The definition of cost categories relied on by this analysis is based on ADR thresholds. Establishing cost tiers helps to provide a better understanding of the "affordability" of Avila's accommodation supply, and also helps establish target rates that can be utilized in formulating LCOA policies.

The CCC recommends that local governments determine the "lower-cost" threshold ADR per unit using an approach called the "simplified Robinson" methodology. Using this methodology, the lower-cost threshold would be the lower of either:

- 125 percent of the statewide annual ADR for all surveyed hotels and motels as determined by Smith Travel Research (STR) or
- The ADR for the local area for the "economy" segment of hotels and motels as determined by STR.

The CCC report also provides guidance on defining "moderate" and "higher" cost accommodations. Moderate-cost accommodations are those with ADRs that fall between the low-cost threshold and 125% of the statewide ADR per room. "Higher" cost accommodations are those rooms with ADRs above the moderate-cost threshold.

<sup>&</sup>lt;sup>1</sup> Ainsworth, John, et al. California Coastal Commission, 2016, pp. 1–84, *Public Workshop: Lower Cost Visitor Serving Accommodations*.

<sup>&</sup>lt;sup>2</sup> Ibid.

#### **Cost Thresholds for Avila**

Using STR data provided by Visit California, EPS found that the year-to-date statewide ADR in September 2020 was \$127.83. Applying the first calculation described in the "simplified Robinson" methodology results in an ADR of \$160 (\$128 x 125 percent). Continuing with the methodology, the next step in determining the community's lower-cost threshold is to compare this ADR to the ADR of economy hotels in Avila.

STR categorizes participating hotels and motels into four tiered classes: budget, economy, mid-price, and upscale. Within Avila, STR classifies only one establishment as "economy". Due to the small sample size and related privacy limitations, STR was unable to release its data on ADRs for the economy class subset in Avila. Given this data limitations, and based on the CCC guidance detailed above, EPS determined that the low-cost threshold for Avila should be set at 125 percent of statewide ADR, \$160 per room per night.<sup>3</sup>

#### **Inventory Boundary and Accommodation Inventory**

EPS used the CCC's definition of the "Coastal Zone" to geographically identify the coastal areas for the Avila accommodation inventory. Statewide, the CCC recognizes the Coastal Zone as land and water areas extending seaward to the state's outer limit of jurisdiction (i.e., three miles offshore) including all offshore islands and extending inland generally 1,000 yards from the mean high tide line. In significant coastal estuarine, habitat, and recreational areas, it extends inland to the first major ridgeline paralleling the sea or five miles from the mean high tide line of the sea, whichever is less, and in developed urban areas the zone generally extends inland less than 1,000 yards. Figure 1 shows the Avila Coastal Zone geography. EPS relied on STR's database of hotels and motels, local tourism resources, internet sources, County business tax records, and short-term rental listings to identify overnight accommodations, room counts, sites, and other characteristics for Avila.

<sup>&</sup>lt;sup>3</sup> Based on the methodology provided by the CCC for the other cost categories, there is no distinction between low-cost and moderate-cost accommodations in Avila, while higher cost accommodations are rooms with ADRs higher than \$160.

<sup>4</sup> See Coastal Act Section 30103.

San Luis Bay Inland Sub Area North

Avila Beach URL

San Luis Obispo Planning Area

Avila Beach URL

San Luis Bay Coastal Planning Area

Coastal Zone

Coast

Figure 1. Avila and the Coastal Zone

Source: San Luis Obispo County

#### **Accommodation Rates**

Lodging, rentals, and camping prices were obtained using internet searches of availability on each accommodation's website. For all accommodations except STVR (due to such discrepancy in availability between individual properties), EPS randomly selected weekend date in November 2020 as a point of comparison. The rates recorded do not include cleaning fees, services fees, occupancy fees, or taxes.

## **Units and Capacity**

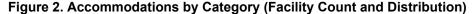
EPS investigated facility capacities to support per-night cost calculations. Capacities indicated for each facility represent the number of units on site multiplied by the maximum number of people per unit as informed by the facility's website or through interviews with hotel staff. Using capacity data, the recorded "Per Night Per Person Cost" calculation is useful for comparisons across the accommodation categories (e.g., hotel rooms vs. STVR), though may not reflect the actual cost per person per night. Consequently, the average cost per person per night reflects the lowest possible cost at full capacity per unit.

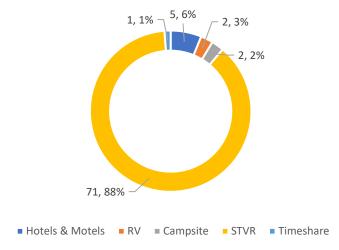
## **Inventory Summary**

The inventory reflects accommodation properties open for business in Avila as of October 2020. Accommodation projects in the development pipeline (i.e., proposed projects and projects currently under construction) are not included in this inventory. One such project, the Harbor Terrace campsite and cabin development at Port San Luis Harbor, is currently under construction. While not counted in the inventory data or analysis because rental rates are not yet known, the Harbor Terrace project will have a notable effect on overall accommodation capacity in Avila. The project will provide 95 RV sites, 56 camp sites, and 31 cabins. A complete list of the overnight accommodations in the Coastal Zone and Inland Area included in the analysis is presented in **Appendix A**.

#### **Accommodations by Type**

EPS research identifies 81 overnight accommodation options with a total capacity for 2,459 guests in Avila. STVR heavily dominate the composition of Avila's market (**Figure 2**). However, after adjusting for the guest capacity of each facility, the breakdown of accommodations by different categories is more balanced, with hotels providing the highest overall capacity (**Figure 3**).<sup>5</sup>





<sup>&</sup>lt;sup>5</sup> A timeshare is defined as a shared ownership model of vacation real estate in which property is jointly owned by multiple parties, and shared under allotments of usage (most often one-week increments).

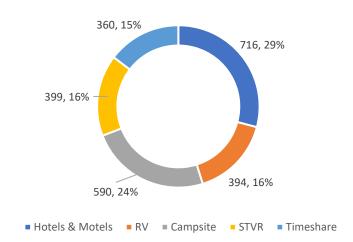
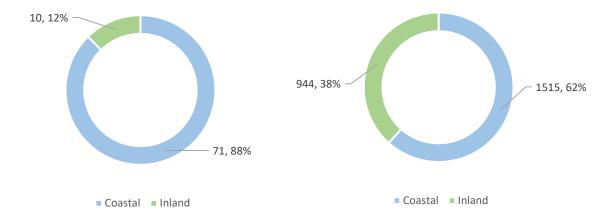


Figure 3. Accommodations by Category (Guest Capacity and Distribution)

#### **Accommodations by Location**

Accommodation facilities are largely located within Avila's Coastal Zone. Capacity consideration again balances out this picture, with nearly 40 percent of Avila's capacity located Inland (**Figure 4**).

Figure 4. Accommodations by Location (Left: Facility Count and Distribution, Right: Guest Capacity and Distribution)



#### **Accommodation Cost**

To determine the appropriate cost thresholds for analysis, EPS relies on a "Cost per Night" calculation. The "Cost per Night per Person" calculation is also included in the inventory for reference. The latter calculation seeks to provide a normalized comparison that accounts for differences in occupant capacities, which can be quite significant when comparing hotel rooms to STVRs. The adjustment captures the situation in which higher capacity accommodations can have significantly lower per-person costs.

Nearly 90 percent of accommodation options in Avila fall in the high-cost category, as shown in **Figure 5**. Even after accounting for capacity, high-cost accommodations still make up nearly 60 percent of the overnight options. Comparing accommodations by cost and location, the overwhelming majoring of high-cost facilities are located in the Coastal Zone (94 percent), while there are double the number of low-cost facilities Inland versus the Coastal Zone (6 versus 3) (**Figure 6**). Looking at accommodations by cost and type, all of the Avila hotels and motels, as

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well as timeshares, are high cost facilities. All RV and campsite accommodations are low cost facilities, and STVR, while primarily high cost, do contribute some to the low-cost supply (**Figure 7**).

Figure 5. Cost Inventory (Left: Facility Count and Distribution, Right: Guest Capacity and Distribution)

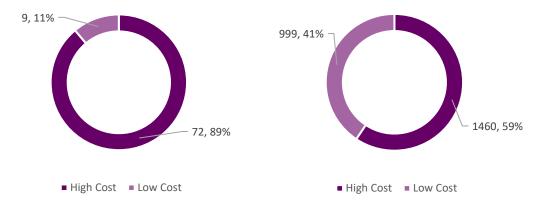


Figure 6. Facility Count and Distribution (Left: High Cost, Right: Low Cost)

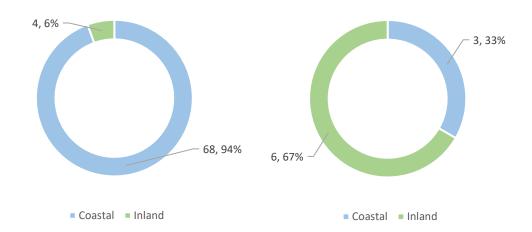
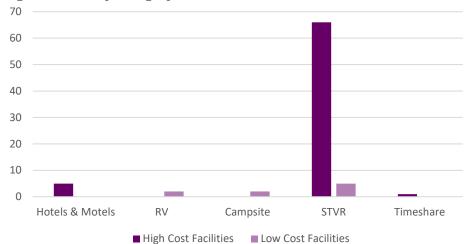


Figure 7. Cost by Category



## **Policy Recommendation**

The accommodation research reveals that while LCOA are available in Avila, the majority of accommodations are higher cost. The inventory analysis finds that only about one in ten (11 percent) of facilities and four in ten (41 percent) of accommodation capacity within Avila are low cost. To increase the supply of low-cost accommodations, San Luis Obispo County could explore the implementation of a LCOA in-lieu fee program.

LCOA units may be required through Coastal Development Plan negotiations with the CCC or through a Community Plan Policy that requires high- and moderate cost accommodation developments to deliver new LCOA, either through delivery of LCOA or participation in an in-lieu fee program which applies to new hospitality development.

This section describes potential program methodologies that could be employed in Avila to mitigate the impacts of new accommodations development and support the provision of LCOAs. EPS recommendations draw from CCC reports and fee programs currently established in other coastal cities; and includes the implementation steps needed to establish the program.

The CCC recommends approaches for LCOA mitigation programs that would protect, produce, and preserve LCOA in the Coastal Zone. 6 Potential program parameters address both existing and new hotel developments, and are as follows:

- 1) New development that eliminates existing LCOA units should either be denied, or required to replace eliminated units at a 1:1 ratio, either with in-kind replacement or an in-lieu fee.
- 2) New high-cost accommodation developments should provide a percentage of new units as lower-cost, either on-site or through payment of a corresponding in-lieu fee.
- 3) New moderate-cost accommodation developments should provide a portion of new units as lower-cost, either on-site or through payment of a corresponding in-lieu fee, at a lower proportion than required for high-cost accommodation developments.

The CCC additionally recommends that in-lieu fees should be charged in perpetuity, in order to support the production of new LCOA units and their ongoing operations and maintenance. The recommendation suggests the fees be charged for a period of 20-30 years, after which time the fee-paying development would be reassessed to determine if it is still high or moderate-cost—and therefore would continue to pay in-lieu fees—or if it had become a lower-cost accommodation, in which case it would cease to pay the fees.

The CCC had recommended a base in-lieu fee of \$30,000 per low-cost room required, to be adjusted annually for inflation. This fee number was based on estimates for new hostel development provided to the CCC by Hosteling International in 2007. However, in its recent workshop series on LCOA, the CCC expressed that this fee—even as adjusted for inflation—is likely inadequate to account for the true cost of developing LCOA units, particularly new lower-cost hotel rooms (as opposed to new hostel beds). The CCC committed to revisiting its approach to calculating the in-lieu fee, based on a broader set of factors impacting the cost of developing LCOA units. However, since the 2016 workshop, a new recommended fee has not been set.

<sup>&</sup>lt;sup>6</sup> Ainsworth, John, et al. California Coastal Commission, 2016, pp. 1–84, *Public Workshop: Lower Cost Visitor Serving Accommodations*.

Recent recommendations for Land Use Plan (LUP) amendments related to the calculation of inlieu fees have suggested that cities should calculate the fees based on financial feasibility analyses for developing lower-cost units that are specific to local market conditions. For example, in the City of Santa Monica, a feasibility analysis estimated that a hypothetical "market-rate", midscale hotel development in the City's Coastal Zone could support a fee level of up to \$15,250 per room on average.

#### **Recommended Parameters for Avila**

Based on review of the CCC guidance and existing programs in other communities, EPS recommends the following considerations for a LCOA program in Avila:

- **Avoid LCOA loss.** The elimination of existing LCOA units should be avoided as much as possible.
- **Study Policy Options.** Development of new high- and moderate-cost overnight accommodations, regardless of whether or not they eliminate existing LCOA, could be required to build LCOA or pay an in-lieu fee. The County should consider an in-depth policy study.
- In-Lieu Fee Considerations. If the County desires a LCOA in-lieu fee, the maximum allowable in-lieu fee amount should be calculated based on an analysis of the financial feasibility of developing new LCOA units. The maximum fee will be equivalent to any calculated financial gap associated with providing LCOA. The County may adopt a fee below the maximum to the extent that other incentives can be brought to bear. Also, fee levels to be charged on new overnight accommodation development likely would be determined based on specific attributes of the project. When establishing the in-lieu fee program, the County will define the set of attributes which will be used to determine the fee level for new developments.

#### **Mitigation Program Implementation Steps**

A LCOA mitigation policy and program must reflect local market conditions and development feasibility. A variety of unique factors should be considered when determining LCOA policy and program details, including the financial feasibility of new LCOA given market conditions and the cost of developing LCOA units. EPS recommends that County consider a hotel development financial feasibility analysis. The feasibility analysis would rely on a financial model which considers the feasibility of high- and moderate-cost accommodation feasibility, and compares the cost of developing a prototypical lower-cost hotel development with project value (i.e., financial subsidy requirement analysis). Given the likelihood that total project costs will exceed project value, the analysis estimates the financial subsidy needed to deliver and operate a typical LCOA facility. The in-lieu fee would be structured to provide the necessary subsidy, and the County (likely along with development partners) would use funding to provide LCOA.

#### Appendix Table 1. Avila Lodging Establishments

Facility Name	Location	Category	Units	People per Unit	Capacity	Percent of Total Capacity	Cost Per Night <sup>1</sup>	Price Category (Per Night)	Cost Per Night Per Person	Price Category (Per Night Per Person)
San Luis Bay Inn	Coastal	Timeshare	144	2.5	360	14.6%	\$269	High	\$108	Low
Avila Lighthouse Suites	Coastal	Hotels & Motels	54	5.0	270	11.0%	\$579	High	\$116	Low
Avila La Fonda Hotel	Coastal	Hotels & Motels	28	2.2	62	2.5%	\$458	High	\$207	High
Inn at Avila Beach <sup>2</sup>	Coastal	Hotels & Motels	32	2.0	64	2.6%	\$309	High	\$155	Low
Avila Village Inn	Inland	Hotels & Motels	30	2.0	60	2.4%	\$269	High	\$135	Low
Sycamore Mineral Springs Resort & Spa	Inland	Hotels & Motels	72	3.6	260	10.6%	\$404	High	\$112	Low
Port San Luis RV Campground	Coastal	RV	39	10	390	15.9%	\$69	Low	\$7	Low
Avila / Pismo Beach KOA	Inland	Campsite	102	5.4	554	22.5%	\$93	Low	\$17	Low
Beachside Farm Campground	Inland	•	6	5. <del>4</del> 6	36	1.5%	\$93 \$59		\$17 \$10	
Glamping in the "Cozy Gnome Home"	Inland	Campsite RV	1	4	4	0.2%	\$125	Low	\$10 \$31	Low
Villa Risa Central Coast New Modern Spanish Home	Coastal	STVR	1	8	8	0.2%	\$396	Low High	\$51 \$50	Low Low
•	Coastal	STVR	1	o 7	o 7	0.3%	\$396 \$244	•	\$35	
Amazing Avila House only 150 yards from the beach Blue Wave of Avila	Coastal	STVR	1	, 8	8	0.3%	\$244 \$364	High	\$ან \$46	Low
SUNSET seekers wanted in Avila Beach	Coastal	STVR	1	5	5	0.3%	\$504 \$512	High	\$40 \$102	Low Low
356 Front Street	Coastal	STVR	1	6	6	0.2%	\$303	High	\$102 \$51	Low
Blue Skies - Avila Beach Condo		STVR	1	6	6	0.2%	\$303 \$418	High	\$70	
Luxurious condo BEACH FRONT in Avila Beach	Coastal Coastal	STVR	1	6	6	0.2%	\$416 \$959	High	\$70 \$160	Low
"The Treehouse"/studio in oaks. Ocean 5+min. walk	Coastal	STVR	1	3	3	0.2%	\$959 \$134	High	\$160 \$45	Low
75 San Antonia		STVR	1	ა 6	ა 6	0.1%	\$134 \$396	Low	\$45 \$66	Low
	Coastal	STVR	1	4	4	0.2%	\$390 \$233	High	\$66 \$58	Low
196 Front Street	Coastal	STVR	1	4	4	0.2%	\$233 \$188	High		Low
Waterfront Resort in Avila Beach	Coastal	STVR	1	6		0.2%	\$188 \$259	High	\$47	Low
Avila Beach House Seven sisters *New HOME* 5 min to beach & downtown	Coastal	STVR	1	6	6	0.2%	\$259 \$363	High	\$43	Low
Avila Beach Oceans 353	Coastal	STVR	1	6	6 5	0.2%	\$353 \$350	High	\$61	Low
	Coastal	STVR	1	5 8		0.2%	\$350 \$326	High	\$70	Low
358 Front Street	Coastal		1	8 7	8			High	\$41 \$54	Low
Avila Beach Retreat	Coastal	STVR	1		7	0.3%	\$381	High	\$54	Low
Otter Lofts	Coastal	STVR	1	3	3	0.1%	\$225	High	\$75	Low
Avila Beach, Beach Front Bungalo	Coastal	STVR	1	3	3	0.1%	\$352	High	\$117	Low
Seven Sisters AVILA VILLA breathtaking ocean view	Coastal	STVR	1	4	4	0.2%	\$432	High	\$108	Low
Avila Beach amongst the Oaks	Coastal	STVR	1	6	6	0.2%	\$229	High	\$38	Low
Studio condo - ocean view - 50 steps to beach	Coastal	STVR	1	4	4	0.2%	\$316	High	\$79	Low
AVILA BREEZE new condo	Coastal	STVR	1	6	6	0.2%	\$356	High	\$59	Low

#### Appendix Table 2. Avila Lodging Establishments (Continued)

Facility Name	Location	Category	Units	People per Unit	Capacity	Percent of Total Capacity	Cost Per Night <sup>1</sup>	Price Category (Per Night)	Cost Per Night Per Person	Price Category (Per Night Per Person)
AMORE AVII A	Overtal	OT) /D		2		0.00/	0445	LEST	Ф00	1
AMORE AVILA	Coastal	STVR	1	6	6	0.2%	\$415	High	\$69	Low
28 San Miguel	Coastal	STVR	1	4	4	0.2%	\$233	High	\$58	Low
215 San Miguel	Coastal	STVR	1	8	8	0.3%	\$228	High	\$29	Low
Bare Feet Retreat MONTHLY RENTAL	Inland	STVR	1	4	4	0.2%	\$131	Low	\$33	Low
219 San Miguel	Coastal	STVR	1	6	6	0.2%	\$228	High	\$38	Low
65 San Miguel	Coastal	STVR	1	8	8	0.3%	\$394	High	\$49	Low
Kelsey Family Beach House	Coastal	STVR	1	8	8	0.3%	\$425	High	\$53	Low
Avila Beach Bungalow 358	Coastal	STVR	1	2	2	0.1%	\$177	High	\$89	Low
Executive Home Aloha Avila	Inland	STVR	1	2	2	0.1%	\$156	Low	\$78	Low
Seven Sisters AVILA BEACH GEM	Coastal	STVR	1	8	8	0.3%	\$419	High	\$52	Low
NEW LOOK! BIKINI BUNGALOW 50 ft to beach	Coastal	STVR	1	10	10	0.4%	\$526	High	\$53	Low
Otter Lofts II	Coastal	STVR	1	8	8	0.3%	\$425	High	\$53	Low
Seven Sisters BEACHY KEEN	Coastal	STVR	1	4	4	0.2%	\$460	High	\$115	Low
Avila Beach Escape *BEST PRICE*	Coastal	STVR	1	6	6	0.2%	\$308	High	\$51	Low
Sandy's Place	Coastal	STVR	1	8	8	0.3%	\$475	High	\$59	Low
Beach Open! 3 min walk to beach!	Coastal	STVR	1	6	6	0.2%	\$433	High	\$72	Low
245 San Miguel	Coastal	STVR	1	4	4	0.2%	\$228	High	\$57	Low
Large Suite in Waterfront Resort in Avila Beach	Coastal	STVR	1	5	5	0.2%	\$189	High	\$38	Low
90 San Luis Street Unit D	Coastal	STVR	1	4	4	0.2%	\$200	High	\$50	Low
Seven Sisters BEACH HAPPY	Coastal	STVR	1	9	9	0.4%	\$538	High	\$60	Low
341 1st Street	Coastal	STVR	1	6	6	0.2%	\$425	High	\$71	Low
Avila Beach Bungalow 356	Coastal	STVR	1	2	2	0.1%	\$177	High	\$89	Low
90 San Luis Street Unit B	Coastal	STVR	1	2	2	0.1%	\$200	High	\$100	Low
90 San Luis Street Unit A	Coastal	STVR	1	4	4	0.2%	\$182	High	\$46	Low
90 San Luis Street Unit C	Coastal	STVR	1	6	6	0.2%	\$280	High	\$47	Low
Landing Passage! Just steps from the boardwalk.	Coastal	STVR	1	3	3	0.1%	\$255	High	\$85	Low

## Appendix Table 3. Avila Lodging Establishments (Continued)

Facility Name	Location	Category	Units	People per Unit	Capacity	Percent of Total Capacity	Cost Per Night <sup>1</sup>	Price Category (Per Night)	Cost Per Night Per Person	Price Category (Per Night Per Person)
Quiet location, studio, minutes from the beach!	Coastal	STVR	1	2	2	0.1%	\$170	High	\$85	Low
AVILA TIDES - Beautiful décor AMAZING roof deck	Coastal	STVR	1	7	7	0.1%	\$448	High	\$64	Low
61 San Miguel	Coastal	STVR	1	6	6	0.2%	\$396	High	\$66	Low
365 1st Street	Coastal	STVR	1	6	6	0.2%	\$366	High	\$61	Low
SEVEN SISTERS Surf In Surf Out	Coastal	STVR	1	11	11	0.4%	\$566	High	\$51	Low
The Apple Cottage: Just off the 101	Inland	STVR	1	2	2	0.1%	\$89	Low	\$45	Low
Charming LUCKY ONE historic Avila Beach 2cottage	Coastal	STVR	1	4	4	0.2%	\$148	Low	\$37	Low
Avila Valley Farmhouse	Inland	STVR	1	12	12	0.5%	\$1,097	High	\$91	Low
Peaceful Downtown Beach Living (noise sensitive)	Coastal	STVR	1	4	4	0.2%	\$278	High	\$70	Low
55 San Miguel	Coastal	STVR	1	8	8	0.3%	\$439	High	\$55	Low
SUMMER DELIGHT with BIG ocean views ~ 30 nite min	Coastal	STVR	1	4	4	0.2%	\$171	High	\$43	Low
Avila Beach Ocean View	Coastal	STVR	1	4	4	0.2%	\$456	High	\$114	Low
New Avila Beach Home with "Wow Amenities & Views	Coastal	STVR	1	16	16	0.7%	\$1,371	High	\$86	Low
Laguna beach cottage with an ocean view	Coastal	STVR	1	3	3	0.1%	\$180	High	\$60	Low
Hidden Paradise - Casa Monte	Inland	STVR	1	10	10	0.4%	\$925	High	\$93	Low
Avila BOHO Beach Studio	Coastal	STVR	1	2	2	0.1%	\$244	High	\$122	Low
Beautiful Private Large Suite in Avila Beach	Coastal	STVR	1	6	6	0.2%	\$550	High	\$92	Low
Timeshare by the week, sometimes avail 21 days out	Coastal	STVR	1	4	4	0.2%	\$172	High	\$43	Low
Avila BOHO Beach Shack2 bedrooms	Coastal	STVR	1	4	4	0.2%	\$451	High	\$113	Low
FURNISHED OCEANFRONT PARADISE	Coastal	STVR	1	6	6	0.2%	\$231	High	\$39	Low
July 10-17th 2020	Coastal	STVR	1	4	4	0.2%	\$214	High	\$54	Low
Casa San Miguelito Steps Away from Avila Beach!	Coastal	STVR	1	6	6	0.2%	\$595	High	\$99	Low
Avila BOHO Beach Shack3 bedrooms	Coastal	STVR	1	4	4	0.2%	\$579	High	\$145	Low

<sup>&</sup>lt;sup>1</sup> Based on available rates for Saturday, November 14th - 15th.

<sup>&</sup>lt;sup>2</sup> Required a two-night minimum.